

Alternatives to Singling Out Students

The chart below provides preferred alternatives to actions that single out children with unpaid meal charges or low account balances. The encouraged actions are consistent with the disclosure provisions in Federal regulations. As outlined in [7 CFR 245.8](#) and in the footnotes below, many of the “discouraged” actions are prohibited when applied specifically to children eligible to receive free and reduced price meals.

Discouraged Actions	Encouraged Actions
Announcing or publicizing the names of children with unpaid meal charges ¹⁸	Communicating privately with individual families about their child’s outstanding balance
Requiring children with unpaid meal charges to use a different serving line to pick up an alternate meal ¹⁹	Serving children with unpaid meal charges the regular reimbursable meal (or a low-cost, reimbursable alternate meal) in the same serving line
Using hand stamps, stickers, or other physical markers to identify children with meal charge debt ²⁰	Communicating payment reminders directly to adults in the family over the phone or via email
Sending clearly marked notices home with children who have an outstanding balance	Sending discrete reminders in a plain, white envelope, or sending reminders with other communication materials sent to all families
PROHIBITED: Enlisting volunteers, especially the parents or guardians of other students, to request payment from a family with unpaid meal charges	REQUIRED: Allowing only appropriate officials trained on USDA’s confidentiality requirements who have a need to access a child’s account balance or eligibility information to request payment from families with unpaid meal charges unless the family gives approval ²¹
Suggesting or requiring children with unpaid meal charges to work for a meal or to pay back their debt ²²	Working with families to develop a payment plan to pay back meal charge debt
Throwing a child’s meal in the trash if they are unable to pay	Serving children who are unable to pay the regular reimbursable meal or discretely providing a low-cost, reimbursable alternate meal
Serving unappealing alternate meals with low nutritional value as a strategy to embarrass children with unpaid meal debt	Ensuring the alternate meal (if opting to provide one) is a healthy meal and does not single out children with unpaid meal charges*
*For suggestions, see Alternate Meal Options .	

¹⁸ This is prohibited when applied to children eligible for free or reduced price meals. See [42 U.S.C. 1758\(b\)\(10\)](#) and [7 CFR 245.8\(a\)](#).

¹⁹ This is prohibited when applied to children eligible for free or reduced price meals. See [7 CFR 245.8\(d\)](#).

²⁰ This is prohibited when applied to children eligible for free or reduced price meals. See [42 U.S.C. 1758\(b\)\(10\)](#) and [7 CFR 245.8\(b\)](#).

²¹ See: [42 U.S.C. 1758\(a\)\(6\)](#).

²² This is prohibited when applied to children eligible for free or reduced price meals. See [7 CFR 245.8\(c\)](#). Additionally, requiring or allowing children to work to repay a school debt may be a violation of Federal, State, or local labor laws or State or local curriculum policies. Any schools considering this policy should first consult with legal counsel or with the State labor and education departments.

Providing Alternate Meals



FNS encourages SFAs to provide regular, reimbursable meals to all children who want one. Many school food professionals choose to provide all participating children, including those with unpaid meal charges, a regular reimbursable meal. Providing a reimbursable meal prevents the embarrassment of children with unpaid meal charges and ensures schools receive some funding for the meal in the form of a Federal reimbursement at the reduced price or paid rate. For example, for SY 2015-2016, in addition

to any student payments, SFAs received 29 cents for every reimbursable school breakfast served at the paid rate.²³ If a child participating at the paid rate did not have money to pay for their breakfast, the school would still receive 29 cents for serving the child a reimbursable breakfast.

Many SFAs reported that serving alternate meals is not an effective way to address unpaid meal charges. Some emphasized that providing an alternate is costly, as alternate meals are often not reimbursable and require extra staff time to prepare. School officials also suggested alternate meals stigmatize children, embarrassing them and negatively impacting the rest of their school day. One official from a district with an alternate meal policy stressed that “every effort must be made” by schools in their district to collect student’s unpaid meal debt in order to avoid the use of alternate meals.

Some SFAs, however, choose to provide children unable to pay for their breakfast or lunch an alternate meal. Alternate meals usually involve allowing selections of lower cost items, such as a sandwich entrée, a fruit/vegetable, and unflavored milk. Alternates are most often offered without charging children, though SFAs have discretion to charge when providing an alternate, as long as certain requirements are met. For more information, see [Pricing of Alternate Meals](#).

“We provide a limited number of duplicate extra hot entrées. Those entrees are exactly the same as every other student gets and are provided first. When we run out of those, we offer a shelf-stable entree along with fresh fruit or vegetable and milk.”

- School District Official, California

While in some situations an “alternate meal” refers to a meal substitution provided to a child with a disability, unless otherwise stated, this guide refers to alternate meals provided to children with unpaid meal charges.

²³ See: [School Meals - Rates of Reimbursement](#)

Alternate Meal Policy

As outlined in [Local Meal Charge Policies](#), SFAs opting to provide alternate meals to children unable to pay for a meal are encouraged to include information about alternate meals in their local meal charge policy. FNS recommends explaining:

- The meal service(s) during which alternate meals are offered;
- The duration of the provision of alternate meals (e.g., no more than 10 per school year);
- If children must pay for alternate meals, and, if so, whether the cost of the alternate meal is added to the child’s delinquent account;
- When alternate meals are offered (i.e., immediately in lieu of charging, or after a child’s negative balance dips to a certain level); and
- How alternate meals are presented (i.e., a sack lunch or a low-cost reimbursable meal regularly included on the menu).

A checklist of the recommended policy components for SFAs opting to provide alternate meals is included in [Appendix B: Unpaid Meal Charge Policy Checklists](#).



Alternate Meal Options

According to the general meal requirements at [7 CFR 210.10](#), “Schools must offer nutritious, well-balanced, and age-appropriate meals to all the children they serve to improve their diets and safeguard their health.” By providing a reimbursable breakfast or lunch to all students who want one, SFAs can ensure all children have access to a nutritionally adequate meal.

FNS encourages SFAs choosing to provide a non-reimbursable alternate meal to meet the MyPlate guidelines and connect children with the nutrition they need to stay focused during the school day. SFAs should also ensure the alternate meal does not single out children with unpaid meal charges (see [Preventing Student Distress](#)). This section highlights two options for SFAs choosing to provide alternate meals.

Low-Cost Reimbursable Meals

SFAs may offer a simple, low-cost reimbursable meal. Having the alternate as a menu item available for purchase every day will help ensure children unable to pay will not be the only children eating the alternate. In addition, SFAs opting to provide a reimbursable alternate will continue to receive Federal reimbursement at the reduced price or paid rate, helping to lessen the financial impact of unpaid meal charges. To claim an alternate meal that limits choices to lower

cost entrées and other components, schools must offer children at least two different types of fluid milk. In addition, a school participating in the offer versus service (OVS) provision must allow children to select up to five food components for the NSLP and four for the SBP. Alternate meals that only allow children to select three components are not reimbursable.



Alternate Sack Lunches

Schools may instruct children with unpaid meal charges (or the child’s teacher, for very young children) to pick up a “brown bag” alternate in the nurse’s office prior to entering the cafeteria, or deliver the alternate to the child in class before lunch in an insulated lunch bag. This option gives the appearance the child forgot their lunch at home and a family member dropped it off at the school later in the morning.

Proactive Distribution of Alternates

Several SFA representatives who commented on the RFI notice *Unpaid Meal Charges* expressed concern about having to take away a child’s reimbursable meal and replace it with an alternate meal when the charge limit was reached. This practice is costly for the SFA, embarrassing for the child, and unpleasant for the cashier.

To prevent this from happening, commenters recommended notifying the child they will receive the alternate meal ahead of time, preventing the unfortunate circumstance of having to take the “regular” meal away from the child at the point of service. Schools may also contact parents or guardians at the beginning of the school day, allowing time for families to submit payment or provide a lunch from home prior to the meal service. For more information about preventing student distress at the point of service, see [*Move the Point of Service*](#).

Pricing of Alternate Meals

Many SFAs providing alternate meals to children with unpaid meal charges choose to offer alternate meals for free. However, some SFAs choose to charge students for alternate meals. If the SFA charges for the alternate meal, the meal must meet either FNS’ meal pattern or Smart Snacks standard, as the alternate would be considered a food item for sale in the school. The Smart Snacks standards are explained at [7 CFR 210.11](#). More information about Smart Snacks is available at <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks>. If the SFA is not seeking reimbursement, but is still charging students for alternate meals, revenue requirements for nonprogram foods must be met. These requirements are outlined at [7 CFR 210.14\(f\)](#).

Meal Accommodations for Alternate Meals

SFAs opting to provide alternate meals to children with unpaid meal charges are still required to make accommodations for children who are considered to have a disability under [7 CFR 15b.3](#) and whose disability restricts their diet, when the restriction is supported by a medical statement signed by a State licensed healthcare professional. This requirement is included in Federal regulation at [7 CFR 210.10\(m\)\(1\)](#).